

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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John Galloway, <i>et al.</i> ,	:	
	:	
Plaintiffs,	:	
	:	
-against-	:	INDEX NO. 1:07-cv-06435 (LTS)
	:	
Apartment Investment and Management Company, <i>et al.</i> ,	:	
	:	
Defendant.	:	
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**DECLARATION OF LLEZLIE L. GREEN**

I, Llezlie L. Green, have personal knowledge of the matters described in this declaration.

If called to testify regarding these facts, I am competent to do so and would testify as follows:

1. I am an attorney and an associate at the law firm of Cohen, Milstein, Hausfeld & Toll, PLLC, counsel for Plaintiffs. I make this declaration in support of Plaintiffs' Motion to Withdraw as Counsel.
2. Plaintiffs' counsel have made repeated attempts to communicate with and secure discovery responses from Plaintiffs Albert Clendinen, Michael Crispin, Sr., Marciana Forde, Donald Tochtermann, Bradford Tripp, and Charles Wright, III.
3. Plaintiffs counsel have attempted to communicate telephonically on at least two occasions (except where telephone numbers were disconnected), leaving messages whenever possible. Plaintiffs' Counsel have also sent correspondence to the last known addresses for Plaintiffs Albert Clendinen, Michael Crispin, Sr., Marciana Forde, Donald Tochtermann, Bradford Tripp, and Charles Wright, III.

4. In an effort to exhaust every measure available to communication with these plaintiffs, Plaintiffs' Counsel conducted an internet search for potential addresses for each plaintiff and mailed correspondence to at least four possible addresses. In this correspondence, plaintiffs were informed that if they failed to communicate and cooperate with counsel, that counsel would seek leave to withdraw, and the plaintiff's claims would likely be dismissed.

5. Despite these effort, Plaintiffs' Counsel have been unable to communicate with and secure discovery responses for Plaintiffs Albert Clendinen, Michael Crispin, Sr., Marciana Forde, Donald Tochtermann, Bradford Tripp, and Charles Wright, III.

I declare under penalty of perjury that the foregoing is true and correct.

Date: May 9, 2008

/s/ Llezlie L. Green

Llezlie L. Green